

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GRADUATE STUDENTS FOR ACADEMIC
FREEDOM, INC., on behalf of its members,

Plaintiff,

v.

UNITED ELECTRICAL, RADIO AND
MACHINE WORKERS OF AMERICA,
and UNITED ELECTRICAL, RADIO AND
MACHINE WORKERS OF AMERICA
LOCAL 1103 – GRADUATE STUDENTS
UNITED AT THE UNIVERSITY OF
CHICAGO,

Defendants.

Case No. 1:24-cv-6143

**STATEMENT REGARDING BRIEFING SCHEDULE FOR PLAINTIFF'S
MOTION FOR A PRELIMINARY INJUNCTION**

On July 22, 2024, Plaintiff filed a complaint against the Defendants, seeking relief under the First Amendment. Counsel for Defendants have not yet appeared. Given Plaintiff's request for a ruling on this motion for a preliminary injunction by September 30, 2024—as well as its request for expedited oral argument—Plaintiff is filing this motion now, so that both the Court and opposing counsel are made aware of it as soon as possible. As described in the Certificate of Service below, Plaintiff will contact prior counsel in an effort to serve Defendants immediately.

Pursuant to this Court's motions policy, Plaintiff proposes the following briefing schedule, which is consistent with general default deadlines: Any answering brief should be due 14 days after Defendants receive Plaintiff's motion and supporting

memorandum; and any reply brief should be due 7 days after Defendants submit their answering brief(s). *Cf.* LCR 47.1

Dated: July 22, 2024

Respectfully submitted,

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* Pro hac vice applications
forthcoming

/s/ Jonathan M. Linas

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I filed this Statement with the Court via ECF. Because Defendants have not yet entered an appearance, I will attempt to serve the foregoing by process server on July 22, 2024, unless Defendants' counsel agree to service by email. I have also notified counsel who have represented UE in other cases in this district of the filing of the underlying complaint and the motion for a preliminary injunction. I will both email and mail a copy of the motion, the memorandum in support of this motion, and all attachments to that counsel.

Dated: July 22, 2024

/s/ Jonathan M. Linas
Jonathan M. Linas

Counsel for Plaintiff